

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

PROGRESSIVE NORTHERN INSURANCE
COMPANY,

Plaintiff,

vs.

DANIEL BELTEMPO, FRANCINE BELTEMPO,
PAMJAM, INC., JILCO EQUIPMENT LEASING
COMPANY, INC., DANA'S PRO TRUCKING
INC., TRAILMOBILE CORP., TRAILMOBILE
PARTS AND SERVICE CORP., THERMO KING
CORP., INGERSOLL-RAND CO., LTD., and
THERMO KING CORP., A UNIT OF
INGERSOLL-RAND COMPANY LTD.,

Defendants.

Civil Action No. 07-CV-4033 (CS)

**NOTICE OF MOTION FOR
SUMMARY JUDGMENT**

TO: Roger Kunkis, Esq.
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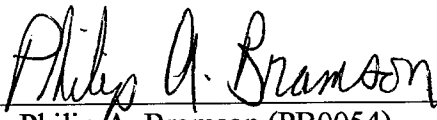
PLEASE TAKE NOTICE that on September 12, 2008, at 9:30 A.M. or as soon thereafter
as counsel may be heard, plaintiff Progressive Northern Insurance Company will move before
the United States District Court for the Southern District of New York, United States

Courthouse, 300 Quarropas Street, White Plains, New York 10601, for an Order granting summary judgment in favor of plaintiff on all counts of the complaint in the above-entitled declaratory judgment action.

PLEASE TAKE FURTHER NOTICE that, in support of this motion, plaintiff will rely on the within memorandum of law, Certification of Philip A. Bramson and exhibits thereto, and Certification of Steven L. Momon and exhibits thereto.

Dated: August 15, 2008
New York, New York

SCHINDEL FARMAN, LIPSIUS,
GARDNER & RABINOVICH, L.L.P

By: 
Philip A. Bramson (PB0054)

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